

REMARKS

Claims 1-10 and 13-19 are now present in this application.

Claims 1 and 15 have been amended, and claim 11 have been cancelled without prejudice or disclaimer. Reconsideration of the application, as amended, is respectfully requested.

Claim 11 stands objected to for a certain informality. In view of the foregoing amendments, it is respectfully submitted that this objection has been addressed. Reconsideration and withdrawal of any objection to the claims are respectfully requested.

Claim 11 stands rejected under 35 USC 112, first paragraph. This rejection is respectfully traversed.

In view of the cancellation of claim 11, this rejection is rendered moot. While applicants do not agree that this claim fails to comply with the written description requirements, this cancellation has nonetheless been made without prejudice or disclaimer to simply expedite prosecution. Accordingly, reconsideration and withdrawal of the 35 USC 112, first paragraph rejection are respectfully requested.

Claims 1, 8, 10, 15-17 and 19 stand rejected under 35 USC 103 as being unpatentable over NAKAZAWA et al., U.S. Patent 6,297,746. This rejection is respectfully traversed.

Claims 2, 11 and 13 stand rejected under 35 USC 103 as being unpatentable over NAKAZAWA et al. in view of HAMADA, U.S. Patent

6,107,937, and MOSEBROOK et al., U.S. Patent 5,905,442. This rejection is respectfully traversed.

Claims 3-6, 9 and 18 stand rejected under 35 USC 103 as being unpatentable over NAKAZAWA et al. in view of HAMADA, and further in view of ALLPORT, U.S. Patent 6,104,334. This rejection is respectfully traversed.

Claim 7 stands rejected under 35 USC 103 as being unpatentable over NAKAZAWA et al. in view of HAMADA, and further in view of DEL CASTILLO et al., U.S. Patent 6,275,166. This rejection is respectfully traversed.

Present independent claims 1 and 15 specify a system and method related to performing a duplication of routing data relating to, for a device, other devices which can transmit and receive signals to/from the device. Claims 1 and 15 has thereby been amended to include features from claim 7. The routing data is also described in the specification (e.g. page 5, lines 16-32; page 8, lines 11-20; page 10, line 38-page 11, line 2; page 28, line 30-page 29, line 10; page 32, lines 10-20), for example.

In the rejection of claim 7, the Examiner relies on Nakazawa et al. (US 6,297,746) and Hamada (US 6,107,937) in view of del Castillo (US 6,275,166).

The Applicants respectfully submit that the combination of Nakazawa and Hamada with del Castillo is inappropriate. In short, Nakazawa and Hamada are based on small, portable controllers where

signals are sent to devices directly as there are no repeaters or relay stations. Del Castillo on the other hand, has a stationary computer platform as well as both relay units and end devices. Such system requires a much more complicated communication protocol than those of Nakazawa and Hamada, and del Castillo therefore represent non-analogous art.

Nakazawa discloses a radio communication system for centrally controlling a plurality of electrical apparatuses. The system comprises a portable host unit (hub) and a plurality of terminal units that control the electrical apparatuses based on control signal from the host unit. A plurality of host units may be provided, in these cases the ID codes registered on a predetermined host unit can be copied to other host units. When orders for the same terminal units overlap, the terminal unit operates on the latest control order.

Hamada discloses what is normally referred to as a remote control system particularly for a very limited geographical area (conference room). The system prevents the mixing of signals from remote manipulation devices. The system comprises remote manipulation devices, controlled devices, and a computer. The manipulation devices are portable and able to store an ID in the memory and to store a control signal only temporarily in the memory. The system uses a permission signal for permitting the transmission of the remote manipulation device having an ID code

through to the controlled device. Thus, the system relates to a simple system within a very limited geographical area such as a room which implies that all devices in the system always are in contact with a controller. In order for the system to select a control signal it uses priority rules.

Both of the systems of Nakazawa and Hamada are designed for use in limited geographical areas, such as single or few rooms. Neither of the systems of Nakazawa and Hamada have repeaters or relay units in the system for repeating signals to/from devices which are out of the range of the controller.

Castillo discloses a system for managing a distributed array of appliances that includes a stationary headend control station having a low power main transceiver and a distributed array of relay units. The system in Castillo has only one single controller, namely the headend control station controlling the system. The relay unit only act in response to commands given by the headend control station. The relay units are not controllers and are not able to generate a signal on their own hand upon reception of input from an appliance.

Claims 1-19 of the present invention relates to a system and method for controlling and monitoring a plurality of devices using portable controllers. Here, each controller comprises identifiers for devices and routing data relating to, for each device, other devices which can transmit and receive signals. The routing table

thereby provides the system with a map of the network topology. According to the present invention, the device identifiers and at least some data from the routing table can be copied to a second controller, so that the second controller immediately learns about the network contents and topology.

It does not make sense to introduce a routing table into any of the systems of Nakazawa and Hamada - simply because there are no repeaters or relay units to route the signals. The network topology is flat since all signals must be sent directly from the original transmitter to the intended end receiver - without any connecting links. For the systems of Nakazawa and Hamada, a list of the devices in the system describes the network topology.

If a routing table was to be introduced in the systems of Nakazawa or Hamada, the systems should first have relay stations which could actually repeat the signals. Introducing relay stations requires a new type of devices to be introduced in the system, and the communication protocol must be considerably changed to manage the use of different classes of destination address fields, i.e. repeater address and final destination address. Also, when receiving a signal, the protocol should be able to extract the original transmitter of the signal although the signal was last transmitted by a relay station. Basically, the entire communication protocol should be replaced, corresponding to forming a whole new system.

As outlined in the above, a routing table cannot be introduced in the systems of Nakazawa or Hamada, as this would mean building a whole new network infrastructure. Moreover, there is nothing in neither Nakazawa nor Hamada which points to del Castillo. The only suggestion for combining these references is applicants' teachings. However, as set forth in MPEP 2143, "The teaching or suggestion to make a claimed combination and the reasonable expectation of success must both be found in the prior art, not in applicant's disclosure." In re Vaeck, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

MPEP 2143.01 goes on to further recite that obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed inventions where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or the knowledge generally available to one of ordinary skill in the art. Here, such teaching, suggestion or motivation is not found.

The applicants therefore respectfully submit that del Castillo does not represent analogous art and that there is no motivation for the skilled person to turn to del Castillo starting from the teachings of Nakazawa and Hamada.

In view of the foregoing amendments and remarks, it is respectfully submitted that the claims of the present application are neither taught nor suggested by the prior art utilized by the

Examiner. Accordingly, reconsideration and withdrawal of all objections and rejections are respectfully requested.

Favorable reconsideration and an early Notice of Allowance are earnestly solicited.

In the event that any outstanding matters remain in this application, the Examiner is invited to contact the undersigned at (703) 205-8000 in the Washington, D.C. area.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

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Attachment: Replacement Drawing Sheet

(Rev. 02/12/2004)